

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF ROOPAL P.
LUHANA IN SUPPORT OF
ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY’S MATERIAL
SHOULD BE FILED UNDER SEAL**

This Document Relates to:

ALL CASES

I, Roopal P. Luhana declare:

1. I am a partner of Chaffin Luhana, LLP, an attorney licensed in the State of New York, and duly admitted to practice before this Court *pro hac vice*, representing Plaintiffs in the above caption action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.
2. Because the materials at issue were designated confidential by Defendants or contain references to documents produced and marked confidential by Defendants, Plaintiffs filed the following under seal:

Document	Description	Designating Party
Exhibit A	Rebuttal Expert Report of Kristen Zgoba, marked “Highly Confidential”	Defendants
Exhibit B	Excerpt of deposition of Veronique Valliere dated October 24, 2025, marked “Highly Confidential”	Defendants

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 14th day of November, 2025 in Brooklyn, New York.

4 /s/Roopal P. Luhana

5 **Roopal P. Luhana**
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